Daniel S. Szalkiewicz, Esq. (DS2323) DANIEL SZALKIEWICZ & ASSOCIATES, P.C. 23 WEST 73RD STREET SUITE 102 NEW YORK, NEW YORK 10023 Attorneys for the Plaintiff John Doe

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JOHN DOE,

Plaintiff,

v.

JIA LUN SHAO a/k/a ANDY SHAO and JINGYUN WANG a/k/a VIVIAN WANG

Defendants.

Civil Action No.: 2:24-cv-09972

STIPULATION ADJOURNING PENDING MOTION RETURN DATE BY ONE MOTION CYCLE

Motion Day: December 16, 2024

Document Electronically Filed

**IT IS HEREBY STIPULATED AND AGREED** by and between the below named attorneys as follows:

- 1. Plaintiff John Doe filed a Motion for a Protective Order on October 21, 2024. *See* Dkt. 2.
  - 2. The motion return date is currently set for December 16, 2024. See Dkt. 16.
- 3. The Parties now respectfully request an adjournment of one motion cycle of the pending motion from December 16, 2024 to January 6, 2025.
- 4. The Parties further stipulate to extend the time for Defendants to answer, move, or otherwise plead in response to Plaintiff's Complaint through and including February 13, 2025.

This request is made jointly, with Defendant Jingyun Wang a/k/a Vivian Wang's consent.

## DANIEL SZALKIEWICZ & ASSOCIATES, P.C.

MORGAN, LEWIS & BOCKIUS LLP

Daniel S. Szalkiewicz, Esq.

Cali P. Madia, Esq.

23 West 73rd Street, Suite 102

New York, New York 10023 Telephone: (212) 706-1007

Facsimile: (646) 849-0033

<u>daniel@lawdss.com</u> Attorneys for Plaintiff

Jia Lun Shao a/k/a Andy Shao 1100 Avenue at Port Imperial Unit 403

Weehawken, NJ 07086

Terry D. Johnson, Esq. 502 Carnegie Center

Princeton, New Jersey 08540-7814

Telephone: (609) 919-6600 Facsimile: (609) 919-6701

terry.johnson@morganlewis.com

Attorneys for Defendant Jingyun Wang

A/K/A Vivian Wang